

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

JENNIFER HASEMANN and DEBBIE
HOTH, individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

GERBER PRODUCTS CO., a corporation,
d/b/a NESTLE NUTRITION, NESTLE
INFANT NUTRITION, AND NESTLE
NUTRITION NORTH AMERICA,

Defendant.

No. 15-cv-02995-MKB-RER

**STIPULATION AND
[PROPOSED] AMENDED CASE
SCHEDULING ORDER**

Plaintiffs Jennifer Hasemann and Debbie Hoth (“Plaintiffs”) and defendant Gerber Products Co. (“Defendant”), through their undersigned counsel, hereby agree to and submit the following proposed amendment to the Court’s current Case Management Plan (Doc. No. 22):

Amendment of Pleadings

Unless otherwise ordered by the Court, the parties shall, by February 17, 2017, join all claims, remedies, and parties pursuant to Fed. R. Civ. P. 18 and 19 and file or amend all pleadings pursuant to Fed. R. Civ. P. 7(a) and 15.

Discovery

All fact discovery shall be closed by March 10, 2017.

Class-Certification Motion

Any motion for class certification shall be filed on or before October 14, 2016. Any opposition shall be filed on or before December 9, 2016. Any reply shall be filed on or before January 20, 2017. Any expert reports offered in support of any class-certification brief shall be

served contemporaneously with the respective brief. Depositions of experts disclosed as part of a class-certification motion or response to such motion shall occur within four weeks of the filing of their reports.

Expert Discovery

For any additional experts who will testify at trial, expert disclosures under rule 26(a)(2) shall be due March 17, 2017. Any rebuttal experts' disclosures under Rule 26(a)(2) shall be due May 12, 2017. Depositions of experts shall occur within five weeks of service of their reports.

Dated: Brooklyn, New York

RAMON E. REYES, JR.
UNITED STATES MAGISTRATE JUDGE

CONSENTED TO:

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